

May 16, 2007

**VIA ECFS**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: LL License Holdings, Inc. - Handset Penetration Compliance Report  
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of LL License Holdings, Inc. ("LL License"), and pursuant to the FCC's February 10, 2006 Order issued in the above-referenced docket, *In re Request for Waiver by LL License Holdings, Inc.*, 21 FCC Rcd 1774, 1779-80 (2006), and the extension of time granted to LL License in *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Petitions for Waiver of Enhanced 911 Phase II Requirements*, Order, 22 FCC Rcd 4835 (rel. Mar. 9, 2007), attached hereto is the company's handset penetration compliance report.

The company reports that as of April 30, 2007, it has reached the 95% handset penetration goal established by the Commission. LL License achieved a 95.39% CDMA handset penetration rate among its subscribers. TDMA and analog handset users comprise 2.6% and 2.01% of its current subscribers, respectively. The company will continue to reach out to its customer base through a direct marketing campaign to encourage its TDMA/analog phone subscribers to switch to new CDMA handsets.

Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned at (202) 344-8065.

Respectfully submitted,



Tony S. Lee  
Counsel for LL License Holdings, Inc.

Enclosure

**Customer upgrade report for FCC on CDMA GPS phones through April 30,2007**

**LL License Holdings, Inc., formerly Great Lakes of Iowa, Inc.**

	<u><b>CDMA</b></u>	<u><b>TDMA</b></u>	<u><b>Analog</b></u>	<u><b>Total Devices</b></u>
<b>Devices</b>	5608	153	118	5879
<b>% of base</b>	95.39%	2.60%	2.01%	
<b>% of GPS Devices</b>	100%	0%	0%	

	<u><b>PSAPs</b></u>
<b># of PSAP's in market</b>	6
<b>Active Phase II PSAPs</b>	6
<b># of pending requests</b>	0
<b>Not Phase II ready</b>	0